

1 WRIGHT, FINLAY & ZAK, LLP  
2 Dana Jonathon Nitz, Esq.  
3 Nevada Bar No. 000050  
4 Natalie C. Lehman, Esq.  
5 Nevada Bar No. 12995  
6 7785 W. Sahara Ave., Suite 200  
7 Las Vegas, NV 89117  
8 (702) 475-7964; Fax: (702) 946-1345  
9 [nlehman@wrightlegal.net](mailto:nlehman@wrightlegal.net)  
10 *Attorneys for Seterus, Inc.*

11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CALVIN M. FAULEY,  
  
Plaintiff,  
  
vs.  
  
SETERUS, INC.,  
  
Defendants.

Case No.: 2:17-cv-02962-RFB-VCF

**STIPULATION AND ORDER TO  
EXTEND ALL DISCOVERY  
DEADLINES SIXTY (60) DAYS**

**(Second Request to Extend Discovery  
Deadlines)**

IT IS HEREBY STIPULATED between Plaintiff Calvin M. Fauley (“Fauley” or “Plaintiff”), by and through his attorneys of record, David H. Krieger, Esq. of the law firm Haines & Krieger, LLC, and Defendant Seterus, Inc. (“Seterus”), by and through its attorneys of record, Dana Jonathon Nitz, Esq. and Natalie C. Lehman, Esq. of the law firm Wright, Finlay & Zak, LLP, in order to facilitate depositions and in furtherance of on-going settlement negotiation, the parties request that all discovery deadlines be continued out by sixty (60) days as follows:

Deadline	Current	Requested
Discovery Cut-Off	8/13/18	10/12/18
Initial Expert Disclosures	6/14/18	8/13/18 (60 days prior to close of discovery)
Rebuttal Expert Disclosures	7/16/18	9/14/18 (30 days after initial expert disclosure)
Dispositive Motions	9/12/18	11/12/18 (31 days after close of discovery.

Interim Status Report	6/14/18	8/13/18 (60 days prior to close of discovery)
-----------------------	---------	---

Joint Pretrial Order due December 12, 2018. If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

No request is being made to the deadline to amend pleadings or add parties.

This request is in compliance with LR 26-4 in that it is being made within 21 days prior to the discovery cut-off deadline. This is the parties' second request for an extension of discovery deadlines and is not intended to cause any delay or prejudice to any party.

IT IS SO STIPULATED.

DATED this 21st day of May, 2018.

DATED this 21st day of May, 2018.

**HAINES & KRIEGER, LLC**

**WRIGHT, FINLAY & ZAK, LLP**

/s/David H. Krieger

/s/ Natalie C. Lehman, Esq.

David H. Krieger, Esq.(NV Bar 9086)

Dana Jonathon Nitz, Esq. (NV Bar 00050)

8985 S. Eastern Ave., Suite 350

Natalie C. Lehman, Esq.(NV Bar 12995)

Henderson, Nevada 89123

7785 W. Sahara Ave., Suite 200

Phone: (702) 880-5554

Las Vegas, Nevada 89117

Fax: (702) 385-5518

Phone: (702) 475-7964

*Attorneys for Plaintiff, Calvin M. Fauley*

Fax: (702) 946-1345

*Attorneys for Defendant, Seterus, Inc.*

**ORDER**

IT IS SO ORDERED.

Dated this 21st day of May, 2018.

UNITED STATES MAGISTRATE JUDGE

*Respectfully submitted by:*

**WRIGHT, FINLAY & ZAK, LLP**

/s/ Natalie C. Lehman, Esq.

Natalie C. Lehman, Esq. (NV Bar 12995)

*Attorneys for Defendant, Seterus, Inc.*